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Fw: ARARs for Western Tar site ; Terre Haute, INVERNETA SIMON to: SALLY JANSEN, Steven Kaiser, Mark Bedford,
Charles Gebien, Phillip Brown

02/03/2010 02:26 PM

Sent by: Steven Kaiser

Mark and Phillip, please add to the Administrative Record Update and the SDMS File. Thanks, Verneta
— Forwarded by VERNETA SIMON/R5/USEPA/US on 09/14/2009 07:07 AM —

**"WEBB, COREY"**
<CWEBB@idem.IN.gov>

To

09/08/2009 09:03 AM

Subject RE: ARARs for Western Tar site; Terre Haute, IN

Good morning, Verneta.

Per your recent request dated September 1, 2009, the intent of this e-mail correspondence is to advise regarding *Applicable or Relevant and Appropriate Requirements* (ARARs) for the Western Tar (aka Railworks; VRP #6990902) site in Terre Haute, Indiana.

As we discussed during our recent telephone conversation, the portion of the site where your office is currently conducting an investigation pertaining to coal tar seeps into the Wabash River is a significant distance south / southwest of the "former process area" portion of the site, which is the focus of the VRP project. Although VRP applicants may select specific source areas or releases for cleanup through the VRP, delineation and/or remediation must be completed for all contamination associated with the source area identified for the VRP project. This delineation and remediation may extend beyond site boundaries and predetermined project areas if necessary to include the full extent of contamination associated with that particular release or source area. Accordingly, IDEM has required that CAVU Ops conduct additional delineation to determine the full extent of contamination stemming from the process area at this site. Please see IDEM's August 29, 2008 letter, attached here FYI. As discussed in my August 10, 2009 e-mail to you, CAVU Ops does not have an approved Remediation Work Plan (RWP) for the VRP project. The RWP is due by October 31, 2009 following the completion of additional delineation activities. Prior to CAVU Ops' clear demonstration to IDEM of the complete delineation of contamination stemming from the process area, it is difficult to assess whether the contamination observed at the river bank may be associated with the contamination in the process area of the site. Due to the historic use of this property as a tar products facility since 1910, similar contamination is likely to be wide-spread across the site, and delineation of specific contaminant plumes associated with individual releases or source areas may be problematic. If the origin of the coal tar observed near the river is unknown, "reverse delineation" to determine the source of this contamination may be necessary. If there is only a limited removal of contamination near the river, it would be prudent to be sure there is no ongoing source or release that could cause this issue to reappear in the future.

That said, the default cleanup levels we would anticipate as part of the VRP project for the process area would be IDEM's Risk Integrated System of Closure (RISC) Residential Default Closure Levels (RDCLs) at the property boundary. This would apply to any contamination extending to the river bank. For sediment, RISC cleanup goals are not available; rather, we would start with US EPA Region 5 Eco-screening numbers, and possibly work towards a site specific closure number.

Please don't hesitate to contact me if you have any other questions or concerns, if you'd like to discuss further, or if I can provide additional information.

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[attachment "08.29 letter.pdf" deleted by Steven Kaiser/R5/USEPA/US]